

Constantine P. Economides (*pro hac vice*)  
(Florida Bar No. 118177)  
Brianna K. Pierce (CA Bar No. 336906)  
ROCHE FREEDMAN LLP  
1 SE 3<sup>rd</sup> Avenue, Suite 1240  
Miami, FL 33131  
Tel: (305) 971-5943  
Email: [ceconomides@rochefreedman.com](mailto:ceconomides@rochefreedman.com)  
[bpierce@rochefreedman.com](mailto:bpierce@rochefreedman.com)

Joseph M. Delich (*pro hac vice*)  
ROCHE FREEDMAN LLP  
(NY Bar No. 5487186)  
99 Park Avenue, Suite 1910  
New York, NY 10016  
Tel: (646) 970-7541  
Email: [jdelich@rochefreedman.com](mailto:jdelich@rochefreedman.com)

*Counsel for Plaintiff,  
Ariel Abittan*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

ARIEL ABITTAN,

PLAINTIFF,

v.

LILY CHAO (A/K/A TIFFANY CHEN, A/K/A  
YUTING CHEN), DAMIEN DING (A/K/A  
DAMIEN LEUNG, A/K/A TAO DING),  
TEMUJIN LABS INC. (A DELAWARE  
CORPORATION), AND TEMUJIN LABS  
INC. (A CAYMAN CORPORATION),

DEFENDANTS,

and

EIAN LABS INC.,

NOMINAL DEFENDANT.

Case No. 5:20-CV-09340-NC

**DECLARATION OF  
CONSTANTINE P. ECONOMIDES IN  
SUPPORT OF PLAINTIFF'S  
OPPOSITION TO DEFENDANT'S  
MOTION TO DISMISS**

Judge: Nathanael Cousins  
Date: December 15, 2021  
Time: 1:00 PM  
Place: Courtroom 5, 4th Floor

